



## **Brand Performance Check**

### **Bel&Bo-Fabrimode NV**

This report covers the evaluation period 01-02-2019 to 31-01-2020

## About the Brand Performance Check

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at [www.fairwear.org](http://www.fairwear.org). The online [Brand Performance Check Guide](#) provides more information about the indicators.

# Brand Performance Check Overview

## Bel&Bo-Fabrimode NV

Evaluation Period: 01-02-2019 to 31-01-2020

Member company information	
Headquarters:	Deerlijk , Belgium
Member since:	2014-11-30
Product types:	Garments, clothing, fashion apparel
Production in countries where Fair Wear is active:	Bangladesh, China, India, Romania, Tunisia, Turkey, Viet Nam
Production in other countries:	Albania, China, Hong Kong Special Administrative Region, France, Italy, Malaysia, Morocco, Pakistan, Poland, Taiwan
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	91%
Benchmarking score	57
Category	Good

## **Disclaimer**

*This performance check was conducted amidst the COVID-19 outbreak in 2020. Due to travel restrictions in 2020, the assessment methodology for this check was modified to adapt to an online version.*

*While the performance check does cover all indicators, Fair Wear was not able to cross-check information with the member company's other departments to the extent it would normally do. This may have led to shorter descriptions/comments in the report. We have taken additional measures to ensure the scores are still inclusive and representative of the performance/progress made: more documentation was requested from the member during the preparation phase and other staff members were interviewed to score a specific indicator, where necessary. Furthermore, due to our improved data management system, Fair Wear was able to better track and document progress, mitigating much of the disadvantage of a remote performance check.*

*This modified version was applied consistently to all members' performance checks starting their financial year in 2019 in order to maintain fair and comparable data.*

*Fair Wear will evaluate the members' response to the Corona-crisis in the performance check about the financial year starting in 2020. For members having financial years starting in April or later, parts of their response can already be reflected in the current performance check report, although their overall response will be evaluated in the next performance check.*

## Summary:

Bel&Bo-Fabrimode NV (hereafter Bel&Bo) has shown progress and met most of Fair Wear's performance requirements. Bel&Bo has monitored 92% of its total production volume, which exceeds Fair Wear's 80% monitoring threshold after the third year of membership. Further, the brand received a benchmarking score of 57. Therefore, Bel&Bo is placed in the 'Good' category.

Bel&Bo further consolidated its supplier base in 2019. The company has a system to identify risks and measure the working conditions of individual suppliers before placing an order. Bel&Bo has made an effort to engage its suppliers in learning labour minute costing. The company is in the process of implementing a system to determine and finance wage increases at the factory level.

Bel&Bo monitors working conditions at production locations by commissioning Fair Wear audit teams and by collecting existing audit reports. All audits have been followed up in a timely manner. Bel&Bo prioritised factories with higher FOB amounts. With these factories, Bel&Bo discussed the corrective action plans on a monthly basis.

There were two worker complaints at factories supplying Bel&Bo in 2019. Both were resolved within the same year. Bel&Bo has enrolled several suppliers in Fair Wear WEP basic training and WEP violence prevention programme. In addition, Bel&Bo had organised training for its production staff on safety in the workplace.

Fair Wear encourages Bel&Bo to take a step further in identifying the link between product price and wage level, with the ultimate goal of working towards living wages at its production locations.

## Performance Category Overview

**Leader:** This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good:** It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement:** Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended:** Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## 1. Purchasing Practices

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	29%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	2	4	0

**Comment:** Bel & Bo is in the process of consolidating its supplier base. The percentage of the production volume from production locations where it buys at least 10% of production capacity is 29% in 2019.

**Recommendation:** Fair Wear recommends Bel&Bo to consolidate its supplier base where possible, and increase leverage at main production locations to effectively request improvements of working conditions. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	52%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	0	4	0

**Comment:** The efforts to consolidate the supplier base have shown in this indicator. The percentage of production in tail-end suppliers has decreased from 68% in 2017 to 62% and in 2018. The number further decreased to 52% in 2019.

**Recommendation:** In the last few years, Bel&Bo has demonstrated efforts in consolidating its supplier base. FWF encourages Bel&Bo to continue its work in improving sourcing practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	62%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

**Comment:** Bel&Bo has shown its commitment to work with a stable group of suppliers and establish long-term relationships. There has been another 8 percentage point increase in this indicator within one year.

**Recommendation:** Bel&Bo has made continues improvement in stablising its supplier base. Fair Wear encourages Bel&Bo to keep up its effort in this work.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

**Comment:** Bel & Bo has a data management system to keep track of documentation collected from suppliers. The system provides information to both the CSR department and the production department. All new suppliers should sign the Code of Labour Practices (CoLP) before an order is placed.

In the last financial year, Bel & Bo has 38 new suppliers. Fair Wear sampled 7 suppliers and verified that the production locations have signed and returned the questionnaires with the Code of Labour Practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

**Comment:** Bel & Bo has a standard process for decision making for new suppliers.

- If it is a direct new supplier, Bel & Bo staff will visit the factory. When the order is small, it is not always realistic to visit.
- All potential factories have to submit previous audit reports (when available), self-evaluation reports, return the Fair Wear questionnaire with the Code of Labour Practices.
- If a supplier is located in Bangladesh, it needs to be part of the Accord. Bel & Bo is a signatory of the Accord.

The potential supplier's working conditions will be assessed based on the information submitted. When a factory does not meet the pre-requisites, but the production department wants to work with them. The CSR department can keep the factory in the system without authorising order placement. Only when the factory meets all requirements, an order can be placed. Bel & Bo has a comprehensive digital system to manage the data of the factories.

**Recommendation:** Risk analysis as part of the decision-making process of selecting new production locations is an important step to mitigate risk and prevent potential problems. Fair Wear recommends Bel&Bo to clearly define preventive actions for identified risks and connect them to sourcing decisions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

**Comment:** Suppliers are evaluated twice a year. The main indicators of the evaluation are communication and follow-up on CAPs. Reward system is not consistently established. But suppliers are informed about their own performance.

Suppliers with good performance are put in the preferred list to place orders. If suppliers do not perform well, there could be serious consequences. For example, one factory did not make progress according to the Accord. Bel & Bo had to phase out the supplier as required by the Accord.

**Recommendation:** Bel&Bo is encouraged to make more explicit how social compliance in the supplier rating system in which quality, relationship, price, and planning are assessed is weighted and how compliance with CoLP leads to production decisions.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

**Comment:** Bel&Bo has implemented the same strategy as last year in production planning.

- The annual production plan is shared in advance with the suppliers. A retro-planning is used to schedule production. Retro-planning is a method that starts from the last step and gradually plan the process until the first step.

- There is a standard lead time based on production time estimated by the factory and Bel&Bo, taking the distance and the delivery time into consideration. An extra 2-3 weeks are added to the lead time to deal with unexpected issues. The lead time only starts when an order is confirmed by Bel&Bo.

- During the entire process, the production planner of Bel&Bo communicates with all suppliers on tech-packs, samples and order delivery.

Bel&Bo has nearly two hundred suppliers. It has not calculated the lead time based on the capacities of all individual suppliers, factory's regular working hours and the suppliers' plans.

**Recommendation:** Fair Wear recommends Bel&Bo to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

**Comment:** Excessive overtime was found in 6 out of 8 factories audited by Fair Wear in 2019.

To improve the situation, Bel & Bo had communicated the issues with every individual factory as part of the CAP follow up. Bel & Bo has not discussed with all factories on the root cause.

In 2019, Bel & Bo had visited some suppliers in Bangladesh together with Fair Wear country representative and discussed with one supplier about the root cause. According to the factory, the top management together with the factory owner, merchandiser, and the planning department had conducted an investigation on the root cause of overtime. The investigation looks at manpower, machine capacity, order booking system and supply chain management. The factory had committed to reduce overtime gradually towards legal limits.

Bel & Bo had also made improvement at brand level: providing better forecasting and higher security to suppliers. Bel & Bo also takes into account the delays caused by Bel & Bo when negotiating lead time.

Bel & Bo has not yet conducted a systematic root cause analysis regarding overtime work.

**Recommendation:** Besides discussing it with the supplier and assessing root causes, Fair Wear strongly recommends Bel&Bo actively take measures when excessive overtime is found. Taking measures to ensure that Bel&Bo knows and shows whether excessive overtime takes place at a supplier is key in resolving the issue. Measures such as regular checks by the local technician, documents checking and interviewing workers help assess whether excessive overtime takes place.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Insufficient	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member’s pricing policy and system, buying contracts.	0	4	0

**Comment:** Bel & Bo has taken various steps towards acquiring more knowledge on the link between buying prices and wage levels. Bel & Bo has invited its suppliers to participate in the Fair Wear seminar on costing. Bel & Bo discussed and tried to motivate its suppliers to work on labour minute costing.

The CEO of Bel & Bo had discussed with one agent to identify how the company can be engaged in open-costing. There is currently a plan in the company to work on cost-breakdowns per product group.

**Requirement:** Bel&Bo needs to demonstrate an understanding of the link between buying prices and wage levels, to ensure their pricing allows for the payment of the legal minimum wage.

**Recommendation:** At a minimum, members are recommended to investigate wage levels in production countries, among others by making use of Fair Wear's Wage Ladder and country studies. As an advanced step, increased transparency in costing and productivity gives insight into the labour costs per product. This forms the basis for ensuring enough is paid to cover at least a minimum wage and for making steps towards living wages.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	0	-2

**Comment:** Fair Wear audits found that one issue relevant to the payment of minimum wages at a factory in China. Several workers were paid lower than minimum wages. Bel&Bo has not yet followed up on the finding.

**Requirement:** If a supplier fails to pay minimum wages, members are expected to respond in time, identify root causes with factory management, and resolve that local labour laws are respected. Evidence of remediation must be collected. Factory visits with a documents check or additional verification by Fair Wear may be needed to verify remediation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** There is no evidence of late payments to suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** Bel&Bo knows the wage levels of most factories from the audit reports. Most production locations of Bel&Bo have not yet paid living wages. Bel&Bo visited several factories in Bangladesh. With higher-leverage factories, Bel&Bo had discussed the root cause of living wages. Most suppliers have little knowledge of living wages. One factory has committed to pay the next level of living wage benchmark within one year, but no further details have been given.

Bel&Bo has also involved suppliers to join the Fair Wear costing training to motivate them into working on open-costing together.

**Requirement:** Bel&Bo must assess the root causes of wages that are lower than living wages, taking into account its leverage and effect of its own pricing policy. Bel&Bo is expected to take an active role in discussing living wages with its suppliers. The Fair Wear wage ladder can be used as a tool to implement living wages, to document, monitor, negotiate and evaluate the improvements at its suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** Bel&Bo is in the preparation stage to encourage suppliers to work towards living wages. Bel&Bo has not yet financed wage increases at the suppliers.

**Requirement:** Bel&Bo should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	0

**Comment:** Bel&Bo has made efforts to encourage its suppliers to work together towards living wages. But it has not financed any wage increase yet.

**Requirement:** Bel&Bo is expected to begin setting a target wage for its production locations.

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## Purchasing Practices

**Possible Points: 52**

**Earned Points: 20**

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## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where approved member own audit(s) took place.	0%	
% of production volume where approved external audits took place.	41%	
% of production volume where Fair Wear audits took place.	42%	
% of production volume where an audit took place.	83%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	8%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	Yes	
Requirement(s) for next performance check		
Total monitoring threshold:	91%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** A specific staff is designated to follow up on issues identified by the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	0	-1

**Comment:** Member makes uses of Fair Wear audits or external audit reports only.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** Fair Wear audit reports are shared with factories usually within three months upon receiving the reports. Audit reports are not yet shared with worker representatives.

**Recommendation:** Before an audit takes place, Bel&Bo is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Basic	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	4	8	-2

**Comment:** Bel&Bo has about 200 suppliers globally. It prioritizes the follow up of audit reports based on its FOB at the factory. For the top 25 factories, Bel&Bo discusses the CAPs with the factories on a monthly basis. For other factories, follow-up is every three months or twice a year.

Email discussion is the main methods to conduct follow-up. Factory visits are combined whenever possible. In 2019, Bel&Bo had visited its main suppliers in Bangladesh and discussed the CAPs. Some factories had prepared detailed follow-up reports and drafted plans based on the discussions.

CAP follow-up reports from factories are verified based on photo evidence provided by the factories. Factories are also required to report the progress in detail via emails.

**Recommendation:** In addition to email communications, Bel&Bo could consider organising a joint training for their suppliers in countries where there are a higher number of suppliers on common audit findings to share experience in remediation and facilitate peer to peer learning.

Bel&Bo has already an established follow-up system. The next step should be to enhance verification of CAP remediation. The feedback and supportive evidence that is sent by suppliers can be complex and difficult to interpret when unfamiliar with the local laws and expertise. Bel&Bo is recommended to use FWF's local team or other local organisations to verify the supportive evidence.

Whenever possible, Bel&Bo is advised to include worker representation in the remediation process. Either to engage workers in identifying and implementing improvements or to verify realised improvements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	52%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	3	4	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

**Comment:** Bel&Bo requested existing audit reports from all factories when they are available. Bel&Bo accessed the report quality. There is a system to follow up on the existing audit reports. For factories with high FOB, Bel&Bo follow up with the factory monthly. For other factories, Bel&Bo follow up at least twice a year.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Advanced			6	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Advanced			6	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Insufficient			-2	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** Bangladesh: Bel&Bo is a signatory of the Bangladesh Accord on Fire and Building Safety (hereafter: Accord). To meet the requirements of the Accord, Bel&Bo discusses with supplier regularly to implement remediations. All new suppliers have to commit to the Accord's requirements. To prevent the risk of gender-based violence, Bel&Bo has worked with FWF local team to set up and support anti-harassment committees. Bel&Bo does not allow subcontracting and encourages factories to keep their records transparent for Fair Wear auditors.

Myanmar: Bel&Bo does not have any suppliers in Myanmar.

Abrasive-blasting: Bel&Bo has a policy on abrasive blasting. All denim suppliers are visited and have signed agreements on not using abrasive-blasting.

Turkey: Bel&Bo is working on a policy on Syrian refugees in Turkey. Bel&Bo has communicated the enhanced monitoring programme requirements to the suppliers. FOB in Turkey is less than 3% in 2019. Therefore, Bel&Bo did not prioritise to visit the suppliers in Turkey.

Other risks:

China: Bel&Bo considers a safe workplace a priority area. In 2019, Bel&Bo hired a safety consultant through Fair Wear to visit its factories in China and develop a general safety training programme for its buyers. The buyers learned how to identify high risks when they visit factories.

Other countries: Bel&Bo uses FWF country studies and audit reports as a basis to identify risks in various countries. For example, Bel&Bo identified that forced labour as high risk. In existing audit reports, Bel&Bo would look for red-flags on freedom of movement. So far no findings were reported in the audits.

**Recommendation:** Knowing the country-specific risks facilitates the starting point for discussing this with suppliers. Member companies can agree on additional commitments that are required to mitigate risks. Bel&Bo can provide additional measures for support and integrate that in the monitoring system.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** Bel&Bo shares audit reports and follow-up reports with other member brands.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	88%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	2	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
Member undertakes additional activities to monitor suppliers.	No			0	1	0

**Comment:** Monitoring requirements are fulfilled at 88% of the suppliers located in low-risk countries.

**Recommendation:** Bel&Bo is advised to conduct a mapping in the supply chain in Italy that includes: subcontractors, ownership of the production location, number of workers and the types of employment relationships. Bel&Bo is encouraged to visit its suppliers in Italy to discuss the risks associated with contracts and social security for migrant workers and casual workers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

**Comment:** Bel&Bo does not conduct full audits at tail-end production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

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## Monitoring and Remediation

**Possible Points: 30**

**Earned Points: 21**

### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	2	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	2	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** A specific employee has been designated to address worker complaints.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

**Comment:** The audits in 2019 found that the Code of Labour Practices was not posted at 3 factories. Bel&Bo has requested the posts of the CoLP. The factories had provided photo evidence.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	25%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

**Comment:** Bel&Bo had organised Fair Wear WEP training to raise awareness at the suppliers, which account for 25% of its total FOB.

**Recommendation:** Fair Wear recommends Bel&Bo to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint helpline among a larger portion of its suppliers. Bel&Bo-Fabrimode NV should ensure good quality systematic training of workers and management on these topics. To this end, Bel&Bo can either use Fair Wear's WEP Basic module or implement training related to the Fair Wear CoLP and complaint helpline through third-party training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	Yes	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	3	6	-2

**Comment:** Bel&Bo had cooperated with Fair Wear to handle all complaints from workers in 2019.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	Active cooperation	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	2	2	0

**Comment:** Bel&Bo works with one Fair Wear brand to address one complaint received in 2019.

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## Complaints Handling

**Possible Points: 17**

**Earned Points: 12**

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## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

**Comment:** All staff at member company are made aware of FWF membership.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** All staff in direct contact with suppliers are informed of FWF requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes + actively support COLP	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	2	2	0

**Comment:** All agents are required to have knowledge about Fair Wear and the Code of Labour Practices. Bel&Bo have provided training to the agents to understand Fair Wear's approach. The agents have collected feedback and followup reports from the suppliers, while Bel&Bo discusses the progress directly with the suppliers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	15%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	2	6	0

**Comment:** Bel&Bo has enrolled several suppliers in Bangladesh and India to participate in Fair Wear's WEP violence prevention training. The training encourages workers to establish internal processes to handle grievances relevant to violence and violence prevention.

**Recommendation:** Fair Wear recommends Bel&Bo to follow up on the initial training by establishing functional worker committees with a step-by-step approach and organise multiple follow-up sessions spread over several months and strengthen herewith internal grievance mechanisms. The training outline should have a worker-centred approach and focus on behavioural and structural change to improve working conditions for the long term, such as gender-based violence and worker-management dialogue. To this end, Bel&Bo-Fabrimode NV can make use of Fair Wear's WEP Communication or Violence and Harassment Prevention modules or implement advanced training through external training providers or brand staff. Non-Fair Wear training must follow the standards outlined in Fair Wear's guidance and checklist available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	Active follow-up	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	2	2	0

**Comment:** One supplier of Bel&Bo had participated in followup training by the Fair Wear local team.

**Recommendation:** Fair Wear recommends Bel&Bo to check whether their supplier conducts regular anti-harassment committee meetings, whether an external expert attends these meetings and whether complaints are reported to the committee.

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## **Training and Capacity Building**

**Possible Points: 13**

**Earned Points: 9**

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## 5. Information Management

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

**Comment:** Bel&Bo had made an effort to establish a thorough system for all CMT locations.

- 1) 60% of the production is directly sourced.
- 2) 40% is still through intermediaries. This number is gradually decreasing. Currently, some small orders have to be allocated by intermediaries to specific production locations.
- 3) The Fair Wear questionnaire is now required to be filled in by factories themselves, not by the intermediary.
- 4) Bel&Bo informs all intermediaries and factories that subcontracting is not allowed.

**Recommendation:** Bel&Bo is advised to develop a systematic approach to complete the supplier list, in which:

- 1) Production locations in high-risk areas such as Turkey, Bangladesh, India and China need to be visited annually;
- 2) Agreements with factories on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system and information are shared on the subcontracted production process;
- 3) Tail-end production locations need to be visited at least once every three years. The worker information sheet needs to be posted in all production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** CSR and other relevant staff actively share information with each other about working conditions at production locations.

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## **Information Management**

**Possible Points: 7**

**Earned Points: 4**

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## 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Bel&Bo complies with Fair Wear's communication policy.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

**Comment:** The social report and brand performance report have been published. Bel&Bo also joined the transparency challenge of Fair Wear and sharing their supplier list with other members internal.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

**Comment:** The social report has been submitted and published.

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## **Transparency**

**Possible Points: 6**

**Earned Points: 5**

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## 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The CEO is involved in the annual evaluation of Fair Wear membership.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	40%	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	2	4	-2

**Comment:** 1.8 - 1.9, 1.13-1.14: partially improved

Bel&Bo has made an effort towards the requirements. It has participated and invited suppliers to join the labour minute costing training. It has raised awareness of living wages among its suppliers in Bangladesh. Preparation work has been done, although the expected outcomes have not yet been achieved.

2.4: compliance with Fair Wear risk policy

Bel&Bo has drafted a policy to address the risk for Turkey. Not all requirements have been implemented.

**Requirement:** It is required to work towards remediation of previous requirements from the last Brand Performance Check. Further engagement needs to be taken with regard to the following requirements mentioned in the last Brand Performance Check.

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## Evaluation

**Possible Points: 6**

**Earned Points: 4**

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# Recommendations to Fair Wear

NA

## Scoring Overview

Category	Earned	Possible
Purchasing Practices	20	52
Monitoring and Remediation	21	30
Complaints Handling	12	17
Training and Capacity Building	9	13
Information Management	4	7
Transparency	5	6
Evaluation	4	6
Totals:	75	131

### Benchmarking Score (earned points divided by possible points)

57

### Performance Benchmarking Category

Good

## Brand Performance Check details

Date of Brand Performance Check:

04-06-2020

Conducted by:

Juliette Li

Interviews with:

Tine Buysens, CSR manager